

**KREINDLER & KREINDLER LLP**

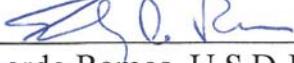
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The application is X granted  
\_\_\_\_\_ denied

  
Edgardo Ramos, U.S.D.J  
Dated: 3/9/2021  
New York, New York

## MEMO ENDORSED

March 5, 2021

Via ECF/CM

Hon. Edgardo Ramos  
United States District Court  
for the Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Christian, et al.* (Raymond Christian) 12 Cr. 626

Dear Judge Ramos:

I represent Raymond Christian who is scheduled to be sentenced in this case on March 19, 2021 at 10 am. Previously, in connection with the most recent supplemental letter-motion to dismiss Counts Four and Five, I had asked this court for oral argument on those issues on the date currently scheduled for sentencing. After consulting with my client, I would like to clarify that Mr. Christian is asking to proceed with his sentencing as scheduled on March 19, 2021.

Under this Court's individual rules of practice, Mr. Christian's updated sentencing submission would be due today. In order to incorporate certain arguments from my client (raised during our most recent meeting) and obtain the final reports from defense experts (on mitigation and corrections), I respectfully request that this Court allow defense sentencing submissions to be filed on or by March 9, 2021, a two-day extension of time, with the government's submission to be filed one week later. I have consulted with AUSA Christopher Clore who does not object to this request.

Respectfully submitted,

/s/  
Megan W. Bennett  
Counsel for Raymond Christian

cc: All counsel of record via ECF/CM.